

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
 vs.) No. 08 CR 888
) Honorable James B. Zagel
ROD BLAGOJEVICH)

MOTION FOR A BRIEF EXTENSION OF TIME
WITHIN WHICH TO FILE PRE-TRIAL MOTIONS

NOW COMES Rod Blagojevich, by and through his counsel, and moves this Court to extend the time for filing defense pre-trial motions to February 22, 2011, at the earliest. In support of this Motion, Blagojevich states the following:

At the most recent status appearance before the Court, a February 15, 2011¹ date was set for the filing of pre-trial defense motions. The defense now seeks a brief extension of time. Defense counsel has spoken with the government and the government does not object to the extension of time to February 22, 2011.

The defense seeks additional time, in part, due to the fact that one of the lead attorneys, Sheldon Sorosky has been held to trial in the case of *United States v. Javell*, Case No. 09 CR 233, before Hon. Judge Darrah (which is expected to conclude by February 18, 2011). In addition, the defendant has sought to explore a number of motions that, prior to the first trial, he elected not to pursue.

¹ The original date had been previously set as February 8, 2011.

This request for a brief extension of time is made in good faith and not for the purpose of delay. An extension of time to February 22, 2011, at the earliest, should be granted, in the interests of justice.

WHEREFORE, Rod Blagojevich prays that this Court will grant the request for a brief extension of time.

Respectfully Submitted,

/s/ Lauren Kaeseberg
One of the attorneys for
Defendant, Rod Blagojevich

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